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August 5, 1999

U.S. Department of Transportation Dockets  
Docket No. (FAA-1999-5925)-4  
400 Seventh Street SW  
Room Plaza 401  
Washington, D.C. 20590

Gentlemen:

As a corporate operator of a **Gulfstream II** (G-I 159) I am writing to comment on Docket No. (FAA-1999-5925) an NPRM to establish RVSM airspace in the Pacific Flight Regions between flight level 290 and flight level 4 10.

As of this date the Federal Aviation Administration has not approved an aircraft modification kit to enable Gulfstream II aircraft to comply with the requirements for RVSM. Having talked to the manufacturer as well as two other organizations pursuing such programs it seems that in reality the earliest these kits will be available will be the second quarter of 2000. **After** they are available there will of course be a period of time involved for operators to schedule their aircraft in for modification and completion of the work involved. Realistically it will be at least the end of the year 2000 before **Gulfstream II** operators **will have** had time to modify the **aircraft** in the fleet-that desire RVSM certification. This time frame is no fault of the aircraft operators. Myself and many other **Gulfstream II** operators have been ready for some time to pay the estimated \$230,000.00 to make our aircraft **useable** in the RVSM airspace.

I would request on behalf of myself and the over 200 other Gulfstream II operators that there be some kind of modification made to the present proposal so that we can continue to operate until we have the opportunity to modify our aircraft. Specifically, it is my belief that the majority of the Gulfstream II operations that would be curtailed by this proposal would be those between the west coast of the U.S. and Hawaii. There are several possible solutions to the problem. One would be to limit the upper RVSM to FL370 on all or some of the routes from the west coast to Hawaii. A fully fueled Gulfstream II is capable of climbing to a maximum initial altitude of FL390. A similar phased in approach was used in the North Atlantic airspace. A second option would be to delay the implementation date on these routes. I have flown these routes many times and it has been my experience that with the number of established tracks to Hawaii there is not an overcrowding in that route structure that would necessitate the additional capacity right away. A third option could be that Oakland Oceanic with prior notice would provide 2000 **foot** separation for non RVSM aircraft for those routes.



All of these options that I have proposed would be for a limited time until such time as operators have had an opportunity to equip their aircraft for RVSM operations. A suggested time frame would be at a minimum until the end of the year 2000.

Thank you for the opportunity to comment on this NPRM. Please feel **free** to contact me if I can supply any more information regarding this situation.

Sincerely:

**Al Goodwin**

Aviation Director

**THE HACADONE CORPORATION**

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